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6						
7	Attorneys for Plaintiffs SANRIO COMPANY, LTD. and SANRIO, INC.					
8						
9	UNITED STATES DISTRICT COURT					
10	NORTHERN DISTRICT OF CALIFORNIA					
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12						
13	SANRIO COMPANY, LTD., a Japanese corporation and SANRIO, INC., a California	Civil Action No. C 09-00440 MHP				
14	corporation,	STIPULATION TO EXTEND				
15	Plaintiffs,	DISCOVERY DEADLINES; [<u>PROPOSED]</u> ORDER				
16	VS.					
17	J.I.K. Accessories, Inc., Accessitive Accessories, Inc., B.B. Apparels Inc., Amuseco					
18	Accessories, Inc., Nana Accessory, Inc., Seanna Corporation, Heiress Enterprises, Inc., Pinkland					
19	Corporation, Inc., Bliss, Final Choice, Joon Sik Bae, Yong Woo Kim, Any Bae, Jason Bae,					
	Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee, Sukmin Bae, John Bae, Lisa Bae, Grace Kim,					
20	Ken Chung, Yeun Sik Cha, Debbie Kim, DOES 1-10,					
21	Defendants					
22						
23						
24	Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and					
25	defendants that currently remain in the case respectfully submit this stipulation requesting an					
26	extension of time for discovery and other dates as follows.					
27	WHEREAS, plaintiffs and defendants J.I.K. Accessories, Inc., Accessitive					
28	STIPULATION AND [PROPOSED] ORDER 1					

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1	Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae, Andy Bae			
2	and Brian Bae (the "Joon Sik Bae Defendants") participated in further mediation on February			
3	28, 2010, subsequently agreed to settlement terms, and are currently finalizing their settlement			
4	documents;			
5	WHEREAS, plaintiffs and the remaining undersigned defendants John Bae, Lisa Bae,			
6	Bliss and Final Choice (the "John Bae Defendants") are in active settlement discussions and			
7	expect to be able to settle without expending resources on further discovery;			
8	WHEREAS, on January 27, 2011, this Court granted the parties' stipulation to extend			
9	discovery deadlines to give the parties time to continue settlement negotiations;			
10	WHEREAS, the current deadline to complete fact discovery is April 29, 2011;			
11	WHEREAS, the Joon Sik Bae Defendants and the John Bae Defendants have			
12	requested additional time to respond to plaintiffs' outstanding discovery requests;			
13	WHEREAS, plaintiffs are willing to extend the deadlines for defendants' discovery			
14	responses, but would need additional time for follow-up discovery and depositions once			
15	defendants' responses are received (if the claims against these defendants are not settled);			
16	WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as			
17	requested herein would increase the likelihood of reaching a successful settlement;			
18	WHEREAS, counsel for all of the parties request that discovery and other deadlines be			
19	extended accordingly;			
20	NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby			
21	stipulate and request the Court to order as follows:			
22	1. Discovery and other deadlines shall be extended, with the new deadlines to be as			
23	follows:			
24	Last day to serve fact discovery: June 30, 2011			
25	Expert disclosure: June 30, 2011			
26	Rebuttal expert reports due: July 30, 2011			
27	Last day to serve expert discovery: August 30, 2011			
28	STIPULATION AND [PROPOSED] ORDER 2			

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1		Dispositive motions hearing:		October 17, 2011 at 2:00 p.m.
2		Trial:		November 15, 2011 at 8:30 p.m. or as soon
3				thereafter as the Court's calendar permits.
4		IT IS SO STIPULATED.		
5				
6				OWEN, WICKERSHAM & ERICKSON, P.C.
	Date:	April 26, 2011	By:	/s/ Noel M. Cook
7		•	· _	NOEL M. COOK
8				LINDA JOY KATTWINKEL
0				Attorneys for Plaintiffs SANRIO COMPANY, LTD., and SANRIO, INC.
9				SAIVIO COM AIVI, LID., and SAIVIO, IVC.
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11				BLEDSOE, CATHCART, DIESTEL, PEDERSEN & TREPPA, LLP
12	Data	A	D	/-/ I I I I I I I I I I I I I I I I I I
13	Date:	April 26, 2011	Бу:	/s/ L. Jay Pedersen L. JAY PEDERSEN
13				JOSHUA N. ROSEN
14				Attorneys for Defendant
15				ACCESSITIVE ACCESSORIES, INC.
16				
				TINGLEY PIONTKOWSKI LLP
17	Date:	April 26, 2011	By:	/s/ Bruce Pointkowski
18				BRUCE C. POINTKOWSKI
19				JONATHAN A. MCMAHON Attorney for Defendants
1)				J.I.K. ACCESSORIES, INC.
20				ACCESSITIVE ACCESSORIES, INC.
21				B.B. APPARELS INC.
<i>L</i> 1				AMUSECO ACCESSORIES, INC.
22				JOON SIK BAE, ANDY BAE, and BRIAN BAE
23				A FA GW AND AGGREENW
24				LEACH AND MCGREEVY
25	Date:	April 26, 2011	Ву:	/s/ Richard E. McGreevy RICHARD E. MCGREEVY
26				BRIAN LEACH
20				Attorney for Defendants
27				JOHN BAE AND AERON BAE, DBA BLISS AND FINAL CHOICE
28		ATION AND [PROPOSED] ORDER		3
	TO EXT	TEND DISCOVERY DEADLINE		C 09-00440 MHP

IT IS SO ORDERED

Dated: __4/28 _____, 2011.



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